

APPROVED by
Decision of the Board of Directors of
Mobile TeleSystems
Public Joint Stock Company
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Policy
“Compliance with Anti-Corruption Legislation”

Moscow

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This Policy establishes key principles and requirements for compliance with Applicable Anti-Corruption Legislation, defines the areas of corruption risks and establishes approaches to their overcoming and/or mitigation at MTS Group. The Policy addresses the risks of bribery and corruption in both the public and private sectors.

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1. Information about regulation

This Policy has been developed in accordance with the requirements set forth in the Applicable Anti-Corruption Legislation, the Code of Business Conduct and Ethics and other internal regulations of the Company.

2. Terms and Abbreviations

Term	Abbreviation	Term Definition (Abbreviation Expansion)
Applicable Definitions:		
Anti-Corruption Clause	ACC	Obligations, as well as warranties and representations of the party/ parties related to observance of the requirements of the Applicable Anti-Corruption Legislation.
Anti-corruption Compliance Program		A system of actions and procedures developed by the Company for ensuring compliance with the requirements of the Applicable Anti-Corruption Legislation.
State Entity	SE	Any state administrative authority of the Russian Federation and foreign state, their constituent entities (including government ministries, services, agencies, government departments and their structural units) and local self-governing body; any political party; all legal entities directly or indirectly controlled by the state (Russian or foreign); legal entities whose activities are perceived by public as the exercise of a public function for the state, except for the compliance with legal requirements; international public organizations.
Public Official	PO	Any Russian or foreign, appointed or elected person holding or deputizing for any public office in a legislative, executive, administrative or judicial body or international organization; any person performing any public function for the government or the state entity; leading politicians, officials of political parties, including candidates for political posts, ambassadors, influential functionaries in nationalized industries or natural monopolies; leaders and employees of state entities, including doctors, military officers, municipal servants, etc.; persons who are known to be related to a public official through kinship, friendship or business ties and (or) act on behalf of and (or) in the interests of a public official.
MTS Group		MTS PJSC, all Subsidiaries of MTS PJSC, as well as all the companies under direct or indirect control of MTS PJSC.

Term	Abbreviation	Term Definition (Abbreviation Expansion)
Bribe Giving		A corrupt practice in the form of a transfer of any (valuables) to a Public Official, personally or through an intermediary (including transfer of any valuables at the direction of a public official to any other individual or legal person).
Abuse of Powers		A corrupt practice in the form of use by a person performing managerial functions in a commercial or other entity of its powers contrary to the legitimate interests of this organization for gaining benefits and advantages for themselves or other persons, or inflicting harm on other persons, if such act results in significant damage to the rights and the legitimate interests of citizens or organizations, or the public interests or interests of the government protected by law.
Commercial Bribery		A corrupt practice in the form of illegal transfer to a person performing managerial functions in a commercial or other entity of any valuables (including transfer of property at the direction of such a person or provision of property-related services, or granting of property rights to other individual or legal entity) for performing actions (omissions) in the interests of a person committing bribery or other persons, if such acts (omissions) fall within the official powers of such a person or if such a person, due to their official post, may facilitate the specified acts (omissions).
Corruption		Any action undertaken by any individual or legal entity related to offering funds, any financial benefits, advantages or values in the form of giving and (or) receiving a bribe or commercial bribery, intermediation in bribery or commercial bribery, abuse of power or in any other form recognized as corrupt in order to exert influence on the actions (omissions) of a bribe receiver and induce them to perform their official duties improperly and (or) to gain any improper commercial or other advantage or benefit and (or) to receive a reward for the improper performance of such duties.
Internal Regulation	IR	A document prescribing standards of conduct within the Company compulsory for all, which the Company adopts within its competence in accordance with laws and regulations.
Political Sponsorship (funding of political activities)		Assistance in monetary or any other form provided in support of political parties, candidates for political posts, their election campaigns or political events, politicians, political party activists, self-nominated candidates (independent candidates).

Term	Abbreviation	Term Definition (Abbreviation Expansion)
Bribe Receiving		A corrupt practice in the form of receiving by a Public Official, personally or through an intermediary, of a bribe in the form of valuables (including cases when a bribe is given to any other individual or legal entity at the direction of a Public Official) for performing actions (omissions) in the interests of a bribe giver or persons represented by a bribe giver, if such actions (omissions) fall within official powers of a public official, or if a public official, by virtue of their official position, is able to facilitate the aforesaid actions (omissions), as well as for general patronage or connivance in the performance of official duties.
Intermediation in Bribery		A corrupt practice in the form of direct transfer of a bribe on behalf of a bribe giver or bribe receiver, or other assistance to a bribe giver and (or) a bribe receiver in reaching or implementing an agreement between them on bribe receiving and giving.
Intermediation in Commercial Bribery		A corrupt practice in the form of direct transfer of an item of commercial bribery (illegal remuneration) at the direction of a person transferring an item of commercial bribery, or a person receiving an item of commercial bribery, or any other assistance to such persons in reaching or implementing an agreement between them on transferring and receiving an item of commercial bribery.
Applicable Anti-Corruption Legislation		Russian Anti-Corruption Legislation (Federal Law dated 25.12.2008 No. 273-FZ "On Combating Corruption", the Criminal Code of the Russian Federation, the Civil Code of the Russian Federation, the Administrative Offenses Code of the Russian Federation, as well as other Federal Laws and by-laws of the Russian Federation containing regulations aimed at combating corruption), and similar legislation of the states where the Company conducts its business activities.
Employees		An individual having the employment relationships with the Company.
Valuable (anything of value)		Anything (tangible or intangible) that has value for a recipient. Valuables may include, but are not limited to moneys; transfer of shares, bonds or any other property; payment of expenses; provision of services of any type; gifts; travels); business hospitality; employment; discounts, forgiveness of debt; use of the desired telephone numbers ("vanity numbers"); offers of employment and internships, including for family members; donations to certain charitable organizations; any other transfer of goods, services,

Term	Abbreviation	Term Definition (Abbreviation Expansion)
		tangible or intangible assets that benefit the recipient. The valuables of any cost may be recognized as illegal under the Applicable Anti-Corruption Legislation.

3. Definitions of Roles

Role	Role Definition
Introduced Definitions:	
Company	A legal entity included in MTS Group
Compliance Manager	A head of Compliance Function/ an employee of the Company responsible for implementation and improvement of the Anti-Corruption Compliance Program
Members of the Company's governing bodies and their committees	President/General Director of the Company; Management Board or other collective executive bodies; Board of Directors; Committees under the Company's Board of Directors, President or the Management Board and the Audit Commission (if any)

5. General Provisions

The Policy establishes the key principles and identifies sensitive areas exposed to corruption risks, setting out approaches to addressing and mitigating them.

This Policy does not supersede or cancel the legal norms prescribed by the Applicable Anti-Corruption Legislation, however, may establish additional requirements. If the Applicable Anti-Corruption Legislation imposes stricter requirements than this Policy, the stricter requirements shall be complied with.

The Persons bound by the Policy shall get familiar, against signature, with the provisions of the Policy presented in a hard copy as per the effective procedure of the Company or, if technically possible, in a soft copy using a digital signature.

6. Key Principles

The Company adheres to the principles of compliance with the Applicable Anti-Corruption Legislation and ethical conduct in all types of business relations regardless of the territory where the Company pursues its business.

6.1. Zero tolerance to corruption in all forms and manifestations

The Company openly **declares its zero tolerance for corruption** in any form, which is an integral part of the Company's corporate culture and daily business practice of the Company, and requires that the Persons bound by the Policy unconditionally abide by its key principles and requirements.

6.2. Tone at the Top and Tone in the Middle

The Company's management, regardless of the level, including members of the governing bodies, perform their official and/or corporate duties reasonably and in good faith being guided by the highest professional

and ethical standards, legal norms and best corporate governance practices, putting the Company interests ahead of their own.

Members of the Company's governing bodies and their committees, as well as the Company's management, shall set by their example a standard of high ethical behavior and nurture in the employees absolute rejection of corruption in all forms and manifestations.

Members of the Company's governing bodies and their committees, regardless of the level, shall be familiar with the Anticorruption Compliance Program, shall allocate the necessary resources for its implementation and perform general monitoring of its implementation, performance discipline and operational efficiency.

6.3. Reputation Strengthening

The Company takes all reasonable steps not to admit anyone who are known to have been involved in illegal practices or who have engaged in any activities that are contrary to the ethical standards of our Company to leadership positions or to the governing bodies of the Company.

6.4. Regular Risk Assessment and Mitigation

The Company annually performs activities to identify, assess and re-assess corruption risks, based on the results of which develops and implements anti-corruption procedures adequate and proportional to the level and nature of the identified risks.

6.5. Notification and Training

The Company is continuously tracking all changes in the Applicable Anti-Corruption Legislation and timely notifies all stakeholders of any relevant changes and trends.

The Company implements and maintains a risk-oriented training program for Persons bound by the Policy on the requirements of Applicable Anti-Corruption Legislation and the Company's compliance controls through a specially developed training system: training is delivered on a regular basis, at least once in 2 (two) years, in person, electronically or in any other available format in accordance with the Annual Training Plan.

6.6. Monitoring the Effectiveness of Controls

The Company monitors effectiveness of the implemented compliance controls, oversees their observance, and when required, introduces improvements.

The Company annually reviews the relevance of compliance controls and accordingly updates the internal regulations containing such controls.

6.7. Audit and Control

The Company ensures the conduction of regular internal and external audits of financial and business operations, as well as the continuous control over the complete and fair presentation of all business transactions in the accounting records and compliance with the requirements of Applicable Anti-Corruption Legislation and internal regulations, including the key principles and requirements established by the Policy.

6.8. Responsible Officer and Responsible Unit, Reporting

The compliance manager is an officer responsible for the introduction and improvement of the Anti-Corruption Compliance Program, possessing the relevant experience and competencies, and having the independence, powers and resources sufficient to perform their duties.

The Compliance Manager, as well as any persons to whom he/she has delegated certain powers, may, if necessary, participate in meetings of the Company's governing bodies and their committees, and also, whenever necessary, provide explanations on the substance of the issues under consideration and communicate the position on the compliance matters to the members of the governing bodies of the Company and their committees for the aforesaid bodies to make informed decisions at both strategic and operational levels.

The Compliance Manager has the right to contact the Chairman of the Audit Committee or any other governing body of the Company or its committee at any time and at their own discretion in order to initiate submission of any compliance-related matters for review. The effectiveness of the Anti-Corruption Compliance Program undergoes a regular review by members of the governing bodies of the Company and their committees.

The compliance manager monitors compliance with the requirements of the Policy and the Applicable Anti-Corruption Legislation, ensures day-to-day management of the Anti-Corruption Compliance Program and its continuous improvement, and participates in the review of transactions exposed to high corruption risk.

7. Corruption Risk Areas

7.1. Relationship with Public Officials and State Entities

Relationship with Public Officials and State Entities require special care as they are exposed to heightened risks associated with bribery and corruption.

For mitigating the corruption risks, it is forbidden to the Persons bound by the Policy to provide any valuables to a Public Official or a State Entity for exerting any undue influence on official decision-making process in order to obtain, retain or control business opportunities or commercial benefits of the Company.

The Company may enter into contracts and (or) provide internships to Public Officials for a legitimate business purpose, subject to compliance with the Applicable Anti-Corruption Legislation and the internal regulations of the Company.



It is forbidden to provide any Valuables to a Public Official or a State Entity for exerting any undue influence for getting preferences.

7.2. Gifts and Business Hospitality

Gifts and Business Hospitality can be used for building long-term partnering relationships between the Company and the parties with which it interacts in the course of its business. However in certain circumstances, the Gifts and Business Hospitality may also be used for exerting illegal influence and may constitute a bribe or commercial bribery.

The Persons bound by the Policy shall avoid Gifts and (or) signs of Business Hospitality that may exert undue influence on independent decision-making in the course of the Company business, come into collision with the Company's interests, or create an impression of such a collision.



*Any **scheme of corruption** through the use of gifts and (or) signs of business hospitality, and **the extortion** of such are **unacceptable**.*

7.3. Sponsorship, Charity, Marketing and Corporate Social Responsibility

The Company may carry out such activities in accordance with the internal regulations governing this sphere. The Company **does not finance** or otherwise **participate** in charitable and (or) sponsorship activities for gaining **any undue advantages** or preferences in relation to business activities.



*It is forbidden to engage in any activities in the field of charity, sponsorship, marketing and corporate social responsibility for **exerting any undue influence**.*

7.4. Participation in Political Activities

The Company shall **not finance** or in any other way **support or stimulate** political parties or their members, including candidates for political posts, their election campaigns or political events, as well as any political organizations or movements. The Company does not allow any contributions for political purposes.

The Company **does not prohibit** Persons bound by the Policy to engage in political activities when such engagement does not contradict the applicable legislation provided that such Persons do not use the Company's property and name in such activities. If an employee becomes a candidate for or is elected/appointed to any post in the State Entity and has an intention to assume that post, the employee shall give a prior notice to the Company in accordance with the Policy "Conflict of Interest Management".



*The Company does **not fund** or **participate** in political activities.*

7.5. Payments through Intermediaries or in Favor of Third Parties

It is forbidden to make payments in favor of any third parties when it is known or there are valid reasons to believe that the full amount or its part will be used for corruption purposes and also when there are no legal grounds for making such payments.

The Company may conduct verification procedures in relation to any third parties for preventing and (or) identifying the risks of the Company's involvement in corruption activities.



*Any payments for corruption purposes are **forbidden**.*

7.6. Conflict of Interest

The Company does not allow any situations in which the Personal Interest (either direct or indirect) of a Person bound by the Policy affects or may affect the proper, objective and unbiased performance of their duties (exercise of powers). Persons bound by the Policy shall comply with the rules set out in the Policy “Conflict of Interest Management”.



Any Conflict of Interest is subject to mandatory disclosure and settlement.

7.7. Transactions of Acquisition and Alienation of Participating Interest in Other Companies

For the transactions of mergers and acquisitions and(or) acquisition/ sale of an interest in any legal entity, the Company established special rules to ensure compliance with the Applicable Anti-Corruption Legislation, including anticorruption verification procedures. When assessing such a transaction, the Company examines the activities of a transaction subject and(or) partner in order to detect the risks of engagement of such a company or partner in corruption actions committed by them earlier. Such work includes, but is not limited to, performance of due diligence prior to entering into a transaction, and determination of actions to be taken in the process of integration of the anti-corruption compliance program after asset acquisition.



*Transactions on the acquisition or sale of participating interests in other companies are subject to **mandatory anti-corruption expert examination**.*

7.8. Contractual Policy

a) Prohibition of Non-Contractual Relationships

The Company prohibits to enter on its behalf or in its interests into any non-contractual relationships not provided for by the applicable legislation or internal regulations with counterparties of any category, including any written or oral arrangements, also in electronic form, that are not included in the main text of an agreement with the counterparty or its annexes, or in any other form, and not subjected to standard approval procedures established in the Company.

Any contract or agreement entered into by the Company in writing or electronically shall constitute full terms and understandings under which such contract or agreement is made.

b) Counterparty Due Diligence

In its relationships with counterparties, the Company shall take reasonable efforts for prevention of corruption in any manifestations, either on behalf or in the interests of the Company. Therefore, the Company requires that its counterparties unconditionally comply with the Applicable Anti-Corruption Legislation and the internal regulations related thereto, as well as support the culture of non-admittance of any unethical conduct, while participating in the Company's procurement procedures and subsequently conducting business with the Company. The Company has developed and implements the counterparty due diligence procedures.

c) Anti-Corruption Clause

For minimizing the risk of corrupt practices by a counterparty, the Company may initiate inclusion of the ACC in contracts/ agreements concluded following the counterparty due diligence.



Interactions with counterparties shall be carried out on a contractual basis and with mandatory due diligence in accordance with the Company's internal regulations.

7.9. Accounting Procedures

All financial transactions, accounting entries and records shall be presented fairly and in sufficient detail in the accounting books of the Company, shall be supported with primary documents and shall be open for audit.

The Company has developed and implemented the procedures of internal financial control aimed at:

- (1) execution of financial transactions subject to general or special authorization of the management;
- (2) accuracy and completeness of accounting records appropriate for issuing statements based on the applicable accounting (financial) reporting standards;
- (3) access to the disposal of assets only subject to general or special authorization of the management;
- (4) regular reconciliation of accounting records presenting the value and composition of assets against their actual value and composition.

The Company shall appoint Employees responsible for preparation and submission of complete and reliable accounting statements within the timeframes required by the applicable law.



Any violation or attempted violation of the internal financial control procedures, misstatement or falsification of accounting statements of the Company are forbidden.

8. Reporting Violations

8.1. The Persons bound by the Policy who became aware of or have valid reasons to believe that the principles or requirements of this Policy and Applicable Anti-Corruption Legislation have been violated, shall immediately report such violation by any of the below means:

- (1) to an immediate supervisor or, if the report concerns the actions of immediate supervisor, to their superior (in any form);
- (2) by sending an email to the Unified Hotline: external.hotline.mts@b1.ru;
- (3) to the Compliance Manager (in any form);
- (4) via the feedback form hotline-mts.b1.ru, available on the corporate portal (anonymously or under one's name);
- (5) using the app Our MTS (anonymously, among other means);
- (6) using the feedback form hotline-mts.b1.ru available on the official website of MTS PJSC (anonymously or under one's name).

The counterparties may submit violation reports by any of the below means:

- (1) by sending an email to the Unified Hotline: external.hotline.mts@b1.ru;
- (2) using the feedback form hotline-mts.b1.ru available on the official website of MTS PJSC (anonymously or under one's name).

8.2. The Company ensures an independent and comprehensive review of all reported violations of the requirements of this Policy in accordance with the internal regulations.

8.3. The Company prohibits any form of harassment (retaliation) against Persons bound by the Policy who have reported a violation in good faith, assisted in the conduct of investigations and/or refused to participate in activities that contradict the principles or requirements of the Policy and/or the Code of Business Conduct and Ethics.

8.4. Any Person bound by the Policy who has violated its requirements may be subject to disciplinary action, up to and including dismissal and/or termination of their contracts, subject to the provisions of such contracts and applicable law.

More details on the requirements for reporting violations are contained in the internal regulations governing conduction of checks and investigations.

9. Policy Execution

Persons bound by the Policy, regardless of their position, are responsible for complying with the principles and requirements of the Policy and the Applicable Anti-Corruption Legislation, as well as for improper control over the actions of their subordinates that resulted in the Policy violations.

10. Guidance

For guidance on the matters related to the Policy application, please contact the Compliance Manager.

11. Referenced Standards

This Policy has been developed based on the requirements and principles of Russian and international regulatory documents, as well as guidelines and methodological instructions of regulatory authorities.

Main documents:

- Federal Law dated 25.12.2008 No. 273-FZ "On Combating Corruption"
- The Criminal Code of the Russian Federation dated 13.06.1996 No. 63-FZ
- The Administrative Offences Code of the Russian Federation dated 30.12.2001 No. 195-FZ
- The United Nations Convention Against Corruption, 2003
- The Criminal Law Convention on Corruption, 1999
- Methodological Recommendations for Development and Adoption by the Companies of Measures to Prevent and Combat Corruption (developed by the Ministry of and Social Security of the Russian Federation)
- International standard ISO 37001:2016
- International standard ISO 37301:2021
- Measures to Prevent Corruption in Organizations, (Ministry of Labor and Social Security of the Russian Federation)